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17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **OAKLAND DIVISION**

20 AMERICAN FEDERATION OF  
21 GOVERNMENT EMPLOYEES, AFL-CIO, et  
al.,

22 Plaintiffs,

23 v.

24 DONALD J. TRUMP, in his official capacity as  
25 President of the United States, et al.,

26 Defendants.  
27  
28

Case No.: 4:25-cv-03070

**DECLARATION OF KHAALIS  
JACKSON**

**DECLARATION OF KHAALIS JACKSON**

I, Khaalis Jackson, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am an Emergency Management Specialist at Federal Emergency Management Agency (“FEMA”), which is in the Department of Homeland Security. I have worked for FEMA since 2013. In my role at FEMA as an Operations Emergency Management Specialist, I advise Federal, State, and Tribal personnel on declaration procedures, resource requests, and federal assistance policies. I conduct capabilities and situational assessments, provide technical assistance to State programs, formulate operational budgets, participate in training and exercises, and collaborate with planning partners to prioritize emergency response activities. Additionally, I coordinate with emergency operations centers and FEMA staff to test natural disaster response plans and roles.

3. I am the President of the American Federation of Government Employees Local 4060 (“Local 4060” or the “Union”). I have been the President since February 2024. I was also the FEMA Region 7 Union Steward for 4 years.

4. Local 4060 is the exclusive bargaining representative for a unit of 4,078 dedicated civil servants employed by the Federal Emergency Management Agency (FEMA). These employees carry out essential functions that are central to FEMA’s mission of coordinating federal disaster response and recovery efforts across the nation. Their roles span a wide range of specialized areas, including congressional relations, public and media affairs, logistics, grant management, and disability integration. Each of these functions plays a critical role in ensuring effective federal support before, during, and after disasters. In addition to these core responsibilities, many Local 4060 employees serve in disaster operations as Emergency Management Specialists in both response and recovery capacities, as well as in public assistance and mitigation roles. These professionals are tasked with assessing and addressing breakdowns in Community Lifelines – key services such as communications, transportation, and health

1 systems – and evaluating the immediate and long-term impacts on affected populations. During  
2 disaster response operations, FEMA personnel focus on life-saving measures, the protection of  
3 property, and the fulfillment of basic human needs. In recovery, the emphasis shifts to the long-  
4 term restoration of infrastructure, housing, and public services, and to the stabilization of  
5 communities. Response operations may involve deployment to incident sites, staffing Emergency  
6 Operations Centers, managing resources, conducting search and rescue, or providing disaster  
7 assistance and public information. Recovery personnel lead the federal effort to rebuild and  
8 strengthen affected communities through coordinated Recovery Support Functions (RSFs),  
9 which include planning, housing, economic recovery, infrastructure restoration, and the  
10 preservation of natural and cultural resources. Furthermore, Local 4060 members include Cadre  
11 of On-Call Response/Recovery Employees (CORE) who are hired specifically to provide  
12 temporary yet essential surge capacity during federally declared natural disasters. These roles are  
13 not peripheral – they are integral to FEMA’s ability to fulfill its statutory obligations under the  
14 Stafford Act and other federal authorities.

15 5. The March 27, 2025 Executive Order titled “Exclusions from Federal Labor  
16 Management Relations Programs” (“Executive Order”) covers all of the workers in Local 4060’s  
17 bargaining unit.

18 6. Local 4060’s mission is to advocate for and promote the interests of bargaining  
19 unit members in their federal employment, including working for a safe and fair workplace for  
20 all members. As the exclusive bargaining representative of diese workers, the Union provides  
21 many services to all bargaining unit members. Core functions of the Union include collective  
22 bargaining with the agency to obtain a fair and reasonable collective bargaining agreement  
23 (“CBA”); filing and negotiating grievances against the agency to enforce the terms and  
24 conditions of the CBA; pursuing arbitrations on behalf of workers to enforce the CBA; and  
25 providing other support, guidance, and resources to bargaining unit employees.  
26  
27

1           7.       The Executive Order will have an immediate adverse effect on the Union's ability  
2 to provide these services to unit members and to accomplish its mission. The Order will also  
3 have an immediate adverse impact on workers in the bargaining unit.

4           8.       If the Union is no longer the exclusive bargaining representative of the unit, the  
5 Union cannot enforce the CBA against the agency. The CBA, which is in effect until October  
6 24, 2025, provides important rights and protections to workers. For instance, the CBA:

- 7           a.       Sets terms and conditions for working hours, overtime, sick leave, and paid time  
8               off for workers in the unit.
- 9           b.       Imposes safety and health requirements to ensure the welfare of workers in their  
10           place of employment.
- 11           c.       Establishes protections for workers regarding reduction-in-force ("RIF") actions  
12           and procedures.
- 13           d.       Imposes procedures for and limitations on disciplinary and adverse actions against  
14           workers.
- 15           e.       Provides for an Employee Assistance Program for individuals who have problems  
16           associated with alcohol, drug, marital, family, legal, financial, stress, attendance,  
17           and other personal concerns.
- 18           f.       Establishes grievance and arbitration procedures for employees and the Union to  
19           resolve disputes with the agency over employment matters.

20           Without the Union to represent them and enforce the CBA, the workers will not have the  
21 benefit of those rights and protections going forward. I understand that the agency is also likely  
22 to stop recognizing the CBA under the Executive Order.

23           9.       The Union's staff and activities are funded through members' voluntary dues. If  
24 the Union can no longer receive dues under the Executive Order, the Union will not be able to  
25 continue to function or provide any of its services or protection to the members listed above.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct. Executed on April 2, 2025, in Lee's Summit, MO

3  
4   
5 Khaalis Jackson